

HONORABLE JAMES L. ROBERT

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

LESLIE JACK, individually and as Personal  
Representative of PATRICK JACK; DAVID JACK,  
Individually,

Plaintiffs,

v.

ASBESTOS CORPORATION LTD., et al.,

Defendants.

NO. 2:17-cv-00537 JLR

STIPULATION AND ORDER EXCUSING TOM  
RADCLIFFE FROM ATTENDANCE AT THE  
SEPTEMBER 17, 2018 PRETRIAL  
CONFERENCE

DCO RECITATIONS

DCo's primary trial counsel for this case R. Thomas Radcliffe was admitted Pro Hac Vice on July 19, 2018 [DKT 528]. Prior to the change in the trial date from October 15, 2018 to October 1, 2018 Mr. Radcliffe's family had planned and paid for a vacation out of the country from September 15 to 29, 2018, scheduled with the plan that Mr. Radcliffe would attend the Pretrial conference with the Court on October 1, 2018. The

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of 5

(2:17-cv-00537 JLR)  
[4838-8071-3072]

LAW OFFICES  
GORDON THOMAS HONEYWELL LLP  
ONE UNION SQUARE  
600 UNIVERSITY, SUITE 2100  
SEATTLE, WASHINGTON 98101-4185  
(206) 676-7500 - FACSIMILE (206) 676-7575

1 change in trial date resulted in a change in the Pretrial Conference to September 17,  
2 2018, that necessitates this request.

3 Local DCo counsel Michael Ricketts who will try this case with Mr. Radcliffe and  
4 Diane Kero will attend the Pretrial conference in Mr. Radcliffe's absence. Both have been  
5 involved in this case from the beginning. They will be responsible to represent DCo at the  
6 conference and to convey all information and rulings to Mr. Radcliffe.  
7

8 STIPULATION

9 Defendant DCo, LLC f/k/a Dana Companies, LLC ("DCo") requests this Court  
10 excuse the personal attendance of R. Thomas Radcliffe, National Counsel for the  
11 September 17, 2018 Pretrial Conference. Before submitting this request to the Court  
12 DCo counsel obtained the agreement of all parties to this request.  
13

14 Dated: August 24, 2018.

Dated: August 24, 2018.

15 SCHROETER GOLDMARK & BENDER

GORDON THOMAS HONEYWELL LLP

16  
17 By /s/ Thomas J. Breen

18 Thomas J. Breen, WSBA No. 34574  
19 Counsel for Plaintiff

By /s/ Diane J. Kero

Diane J. Kero, WSBA NO. 11874  
Counsel for Defendant DCo, LLC f/k/a  
Dana Companies, LLC

20 Dated: August 24, 2018.

Dated: August 24, 2018.

21 DEAN OMAR BRANHAM LLP

BENNETT BIGELOW & LEEDOM PS

22  
23 By /s/ Benjamin H. Adams

24 Benjamin H. Adams, *Pro Hac Vice*  
25 Counsel for Plaintiff

By /s/ Richard D. Ross

Richard D. Ross, WSBA No. 34502  
Counsel for Defendant BorgWarner Morse  
Tec LLC

26 STIPULATION AND ORDER EXCUSING TOM RADCLIFFE FROM  
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1 Dated: August 24, 2018.

Dated: August 24, 2018.

2 GARDNER TRABOLSI & ASSOCIATES

LANE POWELL PC

3  
4 By /s/ Ronald Gardner

By /s/ Jeffrey M. Odom

5 Ronald Gardner, WSBA No. 9270  
6 Counsel for Defendant Viad Corporation

Jeffrey M. Odom, WSBA No. 36168  
Counsel for Union Pacific Railroad Co.

7 Dated: August 24, 2018.

Dated: August 24, 2018.

8 PERKINS COIE LLP

FUCILE & REISING LLP

9 By /s/ Kristine E. Kruger

By /s/ Dan Reising

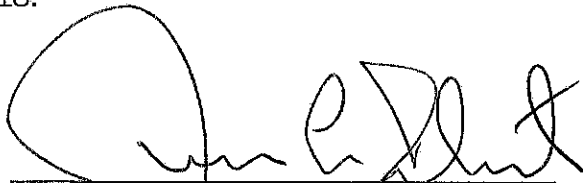
10 Kristine E. Kruger, WSBA No. 44612  
11 Counsel for Honeywell International, Inc.

Mark J. Fucile, WSBA No. 23736  
Daniel K. Reising, WSBA No. 41175  
Counsel for Ford Motor Company

12  
13 ORDER

14 IT IS NOW ORDERED that attorney R. Thomas Radcliffe, National Counsel for DCo,  
15 LLC f/k/a Dana Companies, LLC is excused from attending the September 17, 2018  
16 Pretrial Conference.

17 DATED this <sup>24</sup>27 day of August, 2018.

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19  
20 

21 HONORABLE JAMES L. ROBERT  
UNITED STATES DISTRICT JUDGE

22 Presented By:

23 GORDON THOMAS HONEYWELL LLP

24 By /s/ Diane J. Kero

25 Diane J. Kero, WSBA No. 11874  
26 Attorney for Defendant DCo, LLC f/k/a  
Dana Companies, LLC

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1 Approved as to Form; Notice of Presentation  
2 Waived

3 SCHROETER GOLDMARK & BENDER

4 By /s/ Thomas J. Breen  
5 Thomas J. Breen, WSBA No. 34574  
6 Counsel for Plaintiff

7 DEAN OMAR BRANHAM LLP

8 By /s/ Benjamin H. Adams  
9 Benjamin H. Adams, *Pro Hac Vice*  
10 Counsel for Plaintiff

11 BENNETT BIGELOW & LEEDOM PS

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13 Richard D. Ross, WSBA No. 34502  
14 Counsel for Defendant BorgWarner Morse Tec LLC

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17 Ronald Gardner, WSBA No. 9270  
18 Counsel for Defendant Viad Corporation

19 LANE POWELL PC

20 By /s/ Jeffrey M. Odom  
21 Jeffrey M. Odom, WSBA No. 36168  
22 Counsel for Union Pacific Railroad Co.

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7 Mark J. Fucile, WSBA No. 23736  
8 Daniel K. Reising, WSBA No. 41175  
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